

REMARKS

Applicants request reconsideration and allowance of the claims in view of the above amendments and the following remarks. Claims 66,-78 and 90 have been amended. Support for the amendments to the claims may be found throughout the specification. No new matter has been added. Upon entry of this amendment, claims 66-101 will be pending in the present application, in which claims 66, 78 and 90 are independent.

Applicants note that the specification of U.S. Patent Application Publication 20020010867, which corresponds to the present application, is missing the claim to priority to U.S. Provisional Application 60/176,625, filed on January 19, 2000. In filing the present application on December 21, 2000, applicants requested an amendment to the specification of the application to include a claim to priority to U.S. Provisional Application 60/176,625. Specifically, an amendment to the specification to claim priority to U.S. Provisional Application 60/176,625 was included in the transmittal for the application. Applicants respectfully request that the Examiner confirm the claim to priority in the specification, and correct the present application if necessary.

Applicants thank Examiner Gyorfi for the courtesies extended to applicants' representative, Mr. Sung Kim, during a telephonic interview on June 16, 2005. The substance of the interview is incorporated herein.

The Office Action rejects claims 66-101 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,092,121 to Bennett et al. ("Bennett"). Applicants respectfully traverse this rejection.

Bennett discloses a system that includes at least one local computer system which electronically captures information input by a user of the computer system. The system electronically integrates data captured in heterogeneous information systems from local computer systems and transmits that data over the Internet to multiple diverse servers at remote

computer systems (see abstract). Communication between the local computer systems and the remote servers is direct, with no computer system serving as an intermediary between the local computer systems and the remote servers.

Bennett discloses a local computer system, i.e., a dealer server 11, shown in FIG. 2. In the dealer server 11, in response to a user input or event, a request is generated which is handled by an Input/Output API to generate a data buffer, which represents a machine independent data stream. The data buffer is forwarded to a work flow (WF) client API, which creates a WF client object containing the data buffer. The WF client object is then sent to a store and forward transport mechanism, which sends the WF client object to a destination WF server at a remote computer system via the Internet (see column 5, line 53 - column 6, line 30; FIG. 2). The destination WF server converts the received WF client object to a WF server object, which is then input to a map server function that extracts the data buffer. The data buffer is interpreted to invoke an appropriate message handler, and depending on the action taken by the message handler, the data buffer may be modified and used to generate a WF client object containing other data buffers for transmission to the local computer system (see column 6, lines 38-47; FIG. 3).

In summary, Bennett discloses a peer-to-peer system including one or more direct, bi-lateral relationships between individual local computer systems and individual remote computer systems. In Bennett's system each individual local computer system must establish and maintain a separate and direct relationship with each individual remote computer system targeted for communication. Therefore, in Bennett, for N remote computer systems to be targeted for communication, each local computer system would be required to establish and maintain N relationships.

Bennett does not teach or suggest a system like the claimed invention, which is not peer-to-peer, and wherein a remote computer system may receive requests from and transmit responses to a plurality of incompatible applications that are remote from the computer system,

and also may transmit the requests to and receive the responses from a plurality of incompatible databases that are also remote from the computer system. In essence, each incompatible application may establish a single relationship with the remote computer system in order to communicate with various incompatible databases. Therefore, the remote computer system serves as an intermediary between the incompatible applications and the incompatible databases, such that for N incompatible databases to be targeted for communication, each local computer system having an incompatible application would be required to establish and maintain only one relationship with the remote computer system.

Additionally, Bennett teaches that a request is generated in response to a user input or event (see col. 5, lines 54-55). Bennett does not disclose or suggest a remote computer receiving a request from a plurality of incompatible applications.

In contrast to Bennett, claims 66, 78 and 90, of the present application include, in some form, the elements of receiving, with a programmable computer, various requests from a plurality of incompatible applications remote from said programmable computer; transmitting, with the programmable computer, the received requests to a plurality of incompatible databases remote from said programmable computer; receiving, with the programmable computer, data responses from the plurality of incompatible databases, the data responses corresponding to the transmitted requests from the plurality of incompatible applications; and transmitting, with the programmable computer, the data responses to the plurality of incompatible applications, each data response being transmitted in a format compatible with the application to which it is transmitted. As discussed above, Bennett does not disclose or suggest these claim elements. Accordingly, claims 66, 78 and 90, and their respective dependent claims, are allowable.

In view of the above, claims 66-101 clearly recite elements that are neither disclosed nor suggested by Bennett, or the prior art made of record. Applicants submit that such claims are allowable for at least this reason. Accordingly, applicants request reconsideration and

withdrawal of the rejections.

Applicants submit that the present application is in condition for allowance and request favorable action in the form of a Notice of Allowance. Should the Examiner believe that this application is in condition for disposition other than allowance, the Examiner is invited to contact the undersigned at the telephone number listed below in order to address the Examiner's concerns.

A check for payment of the fee set forth in § 1.17(e) is enclosed along with this submission as required under 37 C.F.R. § 1.114. Please apply any other necessary charges or credits to Deposit Account No. 50-1721.

Date: _____

26 Aug 05

Respectfully submitted,

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